

**TECHNICAL REVIEW AND EVALUATION
OF APPLICATION FOR
AIR QUALITY PERMIT NO. 1000819**

I. INTRODUCTION

This operating permit is issued to BFI Waste Systems of North America, Inc., for the operation of the La Paz County Regional Landfill (LPCL), located approximately three and one-half miles south of the junction of State Highways 95 and 75. The LPCL is located in the Southwest Quarter of Section 13, Township 7 North, Range 19 West, of the Gila and Salt River Baseline and Meridian. The approximate latitude and longitude of the site are 33 degrees, 56 minutes, 37 seconds north, and 114 degrees, 11 minutes, 15 seconds west, respectively. The LPCL consists of a total of 160 acres of land, of which approximately 130 acres are dedicated to refuse disposal. The LPCL is owned by the County of La Paz and operated by BFI Waste Management Systems of North America, Inc. BFI is currently operating the LPCL under a 20 year contract agreement with the County.

The LPCL accepts non-hazardous solid wastes, construction and demolition debris, green waste, white goods and special wastes. Wastes that are conditionally accepted for disposal at the disposal site include the following:

- C Green Waste - The LPCL accepts yard clippings and other green waste for disposal;
- C White Goods - The LPCL accepts large appliances which are temporarily stored in a designated area. Large appliances are stored between one to six months prior to having chlorinated fluorocarbons (CFCs) removed by a contract recycler. The appliances are then landfilled or recycled;
- C Construction and Demolition Debris - The LPCL accepts construction and demolition debris (i.e., waste building materials, packaging and rubble from construction, remodeling, repair and demolition operation of pavement, houses, buildings, and structures)
- C Automobiles/Auto Shredder Waste - Cars, trucks, and non-hazardous auto shredder residue is conditionally accepted at the landfill. The acceptance and disposal of auto shredder residue within lined waste management units at the LPCL follows Best Management Practices as determined in the Arizona Administrative Code (A.A.C.) Section R18-8-307;
- C Tires - The LPCL segregates waste tires detected in the solid waste and temporarily stores the tires until they are shipped off-site or monofilled on-site. Whole tires accepted for recycling are stacked on-site in a segregated location with adequate aisle space and fire

breaks;

- C Asbestos - The acceptance and disposal of asbestos and asbestos containing materials within lined waste management units at the LPCL is performed according to the Best Management Practices outlined in the A.A.C. R18-8-306.

Asbestos disposal occurs within lined waste management units for MSW disposal, but is not commingled with other wastes. The material is separated from the other wastes by a soil covering with a minimum thickness of six inches. At the end of each operating day, the asbestos or asbestos-containing material that has been deposited at the site during the operating day is covered with a minimum of 6 inches of compacted non-asbestos-containing material;

- C Sewage Sludge - The LPCL conditionally accepts sewage sludge. BFI requires the generator, or an agent for the generator, to provide documentation which adequately profiles the wastes. Waste only will be accepted if it passes the Paint Filter Test (USEPA Test Method 9095) and the generator has provided that the waste is not hazardous waste. BFI may use the sludge as daily cover material provided it meets the required performance standards;
- C Septage - Septage derived from septic tank pumping, motor homes, and other sources is disposed in a double lined evaporation pond operated by the county;
- C Petroleum-Contaminated Soil (PCS) - The LPCL accepts PCS that is not regulated as a hazardous waste and contains no free liquids. The PCS must contain Total Petroleum Hydrocarbons (TPH) concentrations which are at or below 5000 parts per million by weight (ppmw). The acceptance and disposal of PCS within lined waste management units at the LPCL is handled according to Best Management Practice outlined in A.A.C. R18-2-1600 and,
- C Fly Ash - The LPCL accepts incinerator or other process ash resulting from combustion processes, if the waste is not regulated as a hazardous waste and contains no free liquids.

The primary activity of LPCL is the transportation and deposition of refuse along with the excavation and stockpiling of cover material and soil. The LPCL was designed as an area fill landfill. A defined area of the landfill is excavated, lined, and prepared to receive waste prior to the completion of the previous waste management unit. The fully-developed site will consist of four primary cells (with individual subcells) and leachate collection sumps. Cell construction will continue as a cut-and-fill operation, and excavated materials will be used for daily, intermediate, and final cover. Existing site development includes unpaved access roads, an office trailer, truck scale, fuel storage tanks, water storage tank and pond, utilities, septage pond, perimeter berms, and security fencing.

The natural decomposition of the waste materials, and to some extent the evaporation of volatile compounds in the waste materials, constitute the primary source of emissions. The landfill gas (LFG) that is emitted from the landfill is fundamentally 50 percent methane (CH₄) and 50 percent carbon dioxide (CO₂), with a fraction containing non-methane organic compounds (NMOCs), hazardous air pollutants (HAPs), and volatile organic compounds (VOCs). Particulate emissions due to traffic on unpaved roads, application of a cover layer of soil, soil stockpiling, cover layer distribution, and wind erosion make up a significant amount PM₁₀ pollution.

Leachate is collected from the cell that is receiving refuse and transmitted to an on-site evaporation pond. Leachate is generated by precipitation or other moisture which permeates through the waste material in place and is contained by a subsurface leachate collection and recovery system. The leachate is collected using electric pumps and is eventually directed to an evaporation pond.

A. Company Information

Facility Name:	La Paz County Regional Landfill
Mailing Address:	1300 Arizona Ave., Suite A Parker, AZ 85344
Facility Address:	26999 Hwy 95, Milepost 128 Parker, La Paz County, AZ 85344

B. Attainment Classification

La Paz County Regional Landfill is in an Attainment Area with respect to all the criteria pollutants.

II. PROCESS DESCRIPTION

La Paz County Regional Landfill (LPCL) is an active solid waste landfill (SIC 4953) which accepts municipal solid waste, including residential and commercial wastes. Refuse is trucked in and dumped at a designated location. Current practice is to spread the waste in layers, compacting and covering it with a geosynthetic clay liner and a soil layer. The compacted layers compose the landfill building blocks called cells. The buried waste decomposes biologically and chemically to produce solid, liquid, and gaseous products. Over the course of time the gaseous product which consist of methane, carbon dioxide, non-methane organic compounds, and volatile organic compounds, seeps through the landfill waste and permeates to the surface. This results in landfill gases that are regulated and controlled depending on the age, amount of refuse accepted, and design capacity of the landfill. Currently LPCL is below the allowable emission rate for non-methane organic compounds therefore LPCL is not subject to the control requirement specified in the New Source Performance Standards (NSPS).

The liquid product that is produced in the landfill is mainly rain runoff that soaks through the landfill and escapes through the outer limits of the landfill. To prevent this from happening a liner was installed and a leachate collection system. The leachate collection system collects the rain runoff, or leachate, and pumps the leachate to a leachate pond. This pond emits an insignificant amount of VOCs and HAPs. The constant transport of waste to and from specific cells along with the compacting and burial of the waste, generates a significant amount of dust and particle matter that is dispersed in the air. Wind erosion of the soil cover and other areas locate on the landfill adds to the dust problem also.

III. EMISSIONS

Representative emissions from LPCL are presented in the following section. These emissions calculations are **not** meant to establish any baseline emissions levels. These emissions figures are **not** meant to be emissions limitations of any form. The emission factors used to calculate the potential to emit are from AP-42 (1/95 ed. & 9/98 ed.)

SOURCES : Landfill		
<i>Source</i>	<i>Pollutant</i>	<i>PTE (tpy)</i>
Landfill Gases	VOCs	7.76
	HAPs	4.29
	NMOCs	10.30 Mg/yr
SOURCES : Construction Vehicles on Haul Roads and Landfill Surface		
<i>Source</i>	<i>Pollutant</i>	<i>PTE (tpy)</i>
Compactors	PM10	4.11
Dozers	PM10	31.89
Trackhoe	PM10	18.38
Motor Grader	PM10	13.90
Dump Truck	PM10	21.57
SOURCES :Unpaved Roads		
18 Wheeled Vehicles	PM10	13.75
10 Wheeled Vehicles	PM10	14.73
6 Wheeled Vehicles	PM10	4.16
4 Wheeled Vehicles	PM10	3.64
SOURCES :Stockpile/Surface		
Loadout of Cover onto Landfill Surface	PM10	.006
Wind Erosion of Landfill Cover Storage Pile	PM10	14.789

<i>Source</i>	<i>Pollutant</i>	<i>PTE (tpy)</i>
SOURCES : Generators		
<i>Source</i>	<i>Pollutant</i>	<i>PTE (tpy)</i>
Generator (G1)	VOCs	1.314
	NOx	16.294
	SOx	1.077
	CO	3.511
	PM10	1.156
	HAPs	.02
Generator (G2)	VOCs	.134
	NOx	1.661
	SOx	.110
	CO	.358
	PM10	.118
	HAPs	.002
SOURCES : Leachate Collection System		
<i>Source</i>	<i>Pollutant</i>	<i>PTE (tpy)</i>
Leachate Collection System	VOCs	.001
	HAPs	.00134

IV. APPLICABLE REGULATIONS VERIFICATION

The Permittee has identified the applicable regulations that apply to each unit in the permit application. Table I summarizes the findings of the Department with respect to applicability or non-applicability of applicable regulations that apply to each unit.

TABLE I : Applicable regulations verification

UNIT	DATE	CONTROLS	REGULATIONS	VERIFICATION
Landfill	NA	None	40 CFR §60, Subpart A 40 CFR §60, Subpart WWW, 40 CFR §82, Subpart F 40 CFR §61, Subpart M 40 CFR §61.154	General Provisions Standards of Performance for Municipal Solid Waste Landfills Recycling and Emissions Reduction; regulations pertaining to use and handling of ozone-depleting substances National Emission Standard for Asbestos Standard for active waste disposal sites
Truck Loading/Unloading, Haul Roads, Storage Piles	NA	Watering, etc.	R18-2-604 R18-2-605 R18-2-606 R18-2-607 R18-2-610	Open Areas, Dry Washes or Riverbeds, Roadways and Streets Material Handling Storage Piles Evaluation of Nonpoint Source Emissions
Mobile Sources	NA	NA	AAC R18-2-801 AAC R18-2-802 AAC R18-2-804.A	These rules are applicable to mobile sources.
Misc. Generators	Misc.	NA	A.A.C. R18-2-719.A A.A.C. R18-2-719.B A.A.C. R18-2-719.C.1 A.A.C. R18-2-719.E A.A.C. R18-2-719.F A.A.C. R18-2-719.H A.A.C. R18-2-719.I A.A.C. R18-2-719.J A.A.C. R18-2-719.K	AAC R18-2-719 is applicable to all stationary rotating machinery

V. PERIODIC MONITORING

Landfill Gas

The monitoring requirements for the landfill gas coming out of the landfill are implemented when the Non-Methane Organic Compound mass emission rate of the landfill exceeds 50 Mg/yr.

If the Permittee decides to install, maintain, and operate an **active collection system**, then the Permittee will be required to monitor;

1. The gauge pressure in the gas collection header on a monthly basis;
2. The Nitrogen or oxygen concentration in the landfill gas on a monthly basis; and
3. The temperature of the landfill gas on a monthly basis.

If the Permittee decides to install, maintain, and operate an **enclosed combustor**, then the Permittee will be required to monitor the temperature of the enclosed combustor and the flow to or bypass of the enclosed combustor.

The temperature monitoring device requires:

- a continuous recorder that has a minimum accuracy of ± 1 percent of the temperature being measured expressed in degrees Celsius or ± 0.5 EC, whichever is greater.
(A temperature monitoring device is not required for boilers or process heaters with design heat input capacity greater than 44 megawatts.)

The device that records flow to or bypass of the enclosed combustor shall either;

- record the flow to the control device every 15 minutes; or
- Have the bypass line valve secured in the closed position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve is maintained in the closed position and that the gas flow is not diverted through the bypass line.

If the Permittee decides to install, maintain, and operate an **open flare**, then the Permittee will be required to monitor the temperature of the open flare and the flow to or bypass of the open flare.

The open flare requires a heat sensing device, such as an ultraviolet beam sensor or thermocouple,

at the pilot light or at the flame itself to indicate the continuous presence of a flame.

The device that records flow to or bypass of the flare shall either,

- record the flow to the control device at least every 15 minutes; or
- have the bypass line valve secured in the closed position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve is maintained in the closed position and that the gas flow is not diverted through the bypass line.

The Permittee will be required to monitor **surface concentrations of methane** according to the instrument specifications. Any closed landfill that has no monitored exceedances of the operational standard in three consecutive quarterly monitoring periods may skip to annual monitoring. Any methane reading of 500 ppm or more above background detected during the annual monitoring returns the frequency for that landfill to quarterly monitoring.

If the Permittee uses a device other than an open flare or an enclosed combustor, then the Permittee shall provide information satisfactory to the Director describing the operation of the control device, the operating parameters that would indicate proper performance, and appropriate monitoring procedures. The Director shall review the information and either approve it, or request that additional information be submitted. The Director may specify additional appropriate monitoring procedures.

If the Permittee seeks to install a collection system that does not meet the specifications for an active collection system or seeks to monitor alternative parameters, then the Permittee shall provide information satisfactory to the Director describing the design and operation of the collection system, the operating parameters that would indicate proper performance, and appropriate monitoring procedures. The Director may specify additional appropriate monitoring procedures.

Asbestos

The Permittee shall monitor the waste that is being accepted for all asbestos-containing waste material. They must also maintain shipment records of all asbestos containing materials that enter the landfill.

Ozone Depleting Materials

The Permittee shall monitor the amount of Ozone depleting material that enters the landfill area and dispose of it in the proper manner specified in Attachment B of the permit.

Non-point Sources

Non-point Sources include loading/unloading, storage, and haul road traffic activities. Typical controls for these sources of fugitive emissions are wetting material and paving/wetting roads respectively. The applicable requirement for these activities is A.A.C.R18-2-610. This regulation prescribes a 40% opacity limit on visible emissions from non-point source activity. Each of the activities mentioned above is performed continuously, and results in large emissions of particulate matter. The monitoring plan requires the Permittee to conduct a visual survey of visible emissions from non-point sources biweekly. The visual survey should be performed in accordance with a pre-approved visual observation plan. The visual observation plan should identify a central point, or multiple points from which observations will be taken. The Permittee is required to keep records of the date and results of each survey. Any observed excess emission event will be reported immediately to the Director in accordance with the excess emissions provisions listed in Section XI, Attachment A. Also the Permittee shall ensure that the water trucks are operated daily to control fugitive emissions from haul roads. If the water trucks are not used on a particular day, the Permittee is required to make a record of the date, along with the reason for not using the water trucks.

VI. TESTING REQUIREMENTS

Control Efficiency of Collection System

Testing is required to establish the control efficiency of the collection system. The reduction efficiency or ppmv shall be established by an initial performance test required under 40 CFR §60.8. Method 25C or Method 18 specified in appendix A of the 40 CFR §60 or alternative method approved by the Director shall be used to determine compliance with the 98 weight-percent efficiency or the 20 ppmv outlet concentration level. If using Method 18 of appendix A in the 40 CFR §60, the minimum list of compounds to be tested shall be those published in the most recent Compilation of Air Pollutant Emission Factors (AP-42).

The collection system must be operated so that the methane concentration is less than 500 ppm above the background at the surface of the landfill. To determine if this level is exceeded, the Permittee shall conduct surface testing around the perimeter of the collection area along a pattern that traverses the landfill at thirty meter intervals and where visual observations indicate elevated concentrations of landfill gas, such as distressed vegetation and cracks or seeps in the cover. The Permittee may establish an alternative traversing pattern that ensures equivalent coverage. Areas with steep slopes or other dangerous areas may be excluded from the surface testing.

Removal of the Collection System

After the installation of a collection and control system, the Permittee shall calculate the NMOC emissions rate for the purposes of determining when the system can be removed. The calculated NMOC gas produced by the landfill shall be less than 50 Mg/yr on three successive test dates. The test dates shall be no less than 90 days apart, and no more than 180 days apart. The flow rate of the landfill gas and average NMOC concentration shall be tested on each of the test dates in order to calculate the NMOC mass emission rate.

VII. INSIGNIFICANT ACTIVITIES

No.	POTENTIAL EMISSION POINTS CLASSIFIED AS “INSIGNIFICANT ACTIVITIES” PURSUANT TO A.A.C. R18-2-101.54
1	5 horsepower gasoline-powered generator for leachate pump.
2	120 horsepower diesel powered generator used to power the facility operations.
3	2 septic ponds